

REMARKS

The Examiner has rejected Claims 1-2 and 13-16 under 35 U.S.C. §103(a), allegedly being unpatentable over ant's admitted prior art (AAPA) in view of Feldman et al. (6,130,889). Applicant respectfully disagrees with such rejection, especially in view of the amendments made hereinabove.

Specifically, the Examiner relies on the following APAA to make a prior art showing of applicant claimed "sending one or more messages containing illusory content from said agent to said client."

"In general, header fields can contain a number of different types of metainformation, as described in RFC 2616. In particular, the metainformation can include information about the resource identified in the request message. Header fields may also be extended to allow for additional entity-header fields, also as defined in RFC 2616. These entity-header fields allow the protocol to be extended to meet the particular needs of a particular entity, but it is important to note that it cannot be assumed that the recipient of a message containing a user-defined entity-header will be able to recognize such a header. RFC 2616 specifically states that unrecognized header fields should be ignored by the recipient and must be forwarded by transparent proxies." (page 8, lines 10-18)

First, such excerpt is not included the background section of the present application, and should not necessarily be considered to be applicant's admitted prior art. Further, even if such paragraph were to be considered AAPA, it would still fail to meet applicant's claimed subject matter.

Specifically, the foregoing excerpt fails to make any mention of applicant's claimed "sending one or more messages containing illusory content from said agent to said client" (emphasis added). Only applicant teaches and claims sending one or more messages containing illusory content from said agent to said client for the

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specific purpose of preventing the client from timing out as a result of security processing at the agent. Simply nowhere in the prior art is there such a combination of features and components for preventing a time out operation in the present specific "security processing" context.

To further distinguish the prior art and in the spirit of expediting the prosecution of the present application, applicant has amended each of the independent claims to require "wherein said one or more messages containing said illusory content is sent for preventing a time out operation as a result of security processing." A notice of allowance or specific prior art showing of such claimed features is respectfully requested.

The Examiner continues by relying on the following excerpt from Feldman to make a prior art showing of applicant claimed "determining if illusory content needs to be sent prior to sending said response; performing processing in said agent as a result of said response; if illusory content needs to be sent during said processing, sending one or more messages containing illusory content from said agent to said client."

"`VC KeepAlive`:

This message is sent by an ISR to inform its neighbors of its continued existence. It is the first message that is transmitted after initialization. In order to prevent the neighbor timeout period from expiring, the `VC KeepAlive` messages must be periodically sent to neighbors. The `VC KeepAlive` need only to be sent when no other protocol messages have been transmitted within the periodic interval time." (col. 7, lines 25-31)

Such excerpt, however, fails to disclose, teach and/or suggest applicant's claimed "determining if illusory content needs to be sent prior to sending said response" (emphasis added). As mentioned earlier, such response is received in response to a request. In sharp contrast, the VC KeepAlive message of Feldman is "only to be sent when no other protocol messages have been transmitted within the

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periodic interval time," and is sent "after initialization." This simply does not meet "prior to sending said response," as defined in the claims.

Again, in order to further distinguish the prior art including Feldman, applicant has amended each of the independent claims to require "wherein said one or more messages containing said illusory content is sent for preventing a time out operation as a result of security processing." A notice of allowance or specific prior art showing of such claimed features is respectfully requested.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed.Cir.1991). Applicant respectfully asserts that at least the third element of the *prima facie* case of obviousness has not been met, in view of the deficiencies set forth hereinabove.

For the reasons set forth hereinabove, the foregoing independent claims are deemed allowable. By virtue of the dependence of the remaining claims on the independent claims discussed hereinabove, such claims are further deemed allowable.

All of the Examiner's rejections and objections are thus deemed to be overcome, and a notice of allowance is respectfully requested.

In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (408) 505-5100. If any fees

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are due in connection with the filing of this paper, the Commissioner is authorized to charge such fees to Deposit Account No. 50-1351 (Order No. NAI1P086/00.058.01).

Respectfully submitted,

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